

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

CHERYL BUTLER

Plaintiff,

V.

**JENNIFER P. COLLINS,
STEVEN C. CURRALL, ROY R.
ANDERSON, JULIE PATTERSON
FORRESTER, HAROLD STANLEY,
PAUL J. WARD, AND SOUTHERN
METHODIST UNIVERSITY**

Defendants,

CIVIL ACTION NO.: 3:18-cv-00037
JURY DEMANDED

UNOPPOSED MOTION TO WITHDRAW AS COUNSEL

COMES NOW, TB Robinson Law Group, PLLC, specifically attorneys Terrence B. Robinson and Gabrielle O. Ilochi, moving to withdraw as counsel of record for the Plaintiff, CHERYL BUTLER, showing as follows:

1. The Plaintiff retained Terrence B. Robinson of TB Robinson Law Group, PLLC, to represent her in this action.
2. This motion is based on good cause in that counsel's withdrawal is in accordance with the terms of their retention by Plaintiff and that an irreconcilable conflict has arisen between the Plaintiff and the undersigned counsel that makes further representation by the undersigned impossible.
3. On October 28, 2019, during an in-person conference with Plaintiff, counsel expressed its intention to withdraw due to multiple reoccurring, fundamental disagreements.

4. Following the conference, on October 28, 2019, Plaintiff sent an email communication with the unmistakable purpose to sever the attorney-client relationship, effectively and immediately terminating representation by counsels of record.

5. The following deadlines/scheduling issues are pending in this case:

<i>Rebuttal to Defendant's Designation of Experts</i>	<i>11/02/19</i>
<i>Discovery Deadline</i>	<i>12/02/19</i>
<i>Mediation Deadline</i>	<i>12/02/19</i>
<i>Motion to Compel Discovery or Impose Sanctions</i>	<i>12/09/19</i>
<i>Dispositive and Nondispositive Motions Deadline</i>	<i>12/16/19</i>
<i>Pretrial Disclosures, Materials, and Objections Deadline</i>	<i>04/06/20</i>
<i>Settlement Conference</i>	<i>04/06/20</i>
<i>Serve and File Disclosure List Deadline</i>	<i>04/20/20</i>
<i>Objections to Pretrial Material and Motions in Limine Deadline</i>	<i>04/20/20</i>
<i>Pretrial Conference Deadline</i>	<i>05/01/20</i>
<i>Trial Date</i>	<i>05/04/20</i>

6. Plaintiff's address is 3341 Charleston Street, Houston, TX 77021, telephone number 713-828-3958, and email address cherylbutler2002@gmail.com.

7. The withdrawal is not sought for the purpose of delay.

8. Plaintiff will not be prejudiced or injured by allowing counsel to withdraw as attorney of record. Movants request that the remainder scheduling deadlines, as referenced herein, be abated for sixty (60) days in order for Plaintiff to secure new local counsel.

PRAYER

Movants, Terrence B. Robinson and Gabrielle O. Ilochi, request that they be allowed to withdraw as attorneys of record for Plaintiff.

Respectfully submitted,
TB Robinson Law Group, PLLC



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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

No conference was held in this matter due to Plaintiff's October 28, 2019 effective immediate termination of Movants as counsel.



Terrence B. Robinson
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this the 28th day of October, 2019, the foregoing *UNOPPOSED MOTION TO WITHDRAW* was electronically filed with the Clerk of the Court using the CM/ECF system and served on all attorney(s) and/or parties of record via the CM/ECF service.

A handwritten signature in blue ink, appearing to read "T-B. Robinson", is positioned above a horizontal line.

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